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## FILED ELECTRONICALLY

Marlene H. Dortch, Secretary Federal Communications Commission 445 12th Street, SW Washington, DC 20554

> Re: WC Dkt. No. 04-313 CC Dkt. No. 01-338

Dear Ms. Dortch:

This letter is submitted for two reasons. First, we add the names of two additional telecommunications manufacturing companies to the 32 others that signed the Comments of Ad Hoc Telecommunications Manufacturing Coalition ("Manufacturer Comments") filed October 4, 2004. The two new signers asked after the Manufacturer Comments were filed that their names be added. They are as follows:

David T. McGraw, President Suttle Apparatus Corporation 223 South Main Street Hector, MN 55342

Robert Ehlers, President TransTech Controls, LLC, dba HauteSpot Networks 3427 Roberto Court San Luis Obispo, CA 93401

We also submit this letter in order to include in the record a study commissioned by the U.S. Chamber of Commerce and released two days ago titled "Sending the Right Signals: Promoting Competition Through Telecommunications Reform" ("U.S. Chamber Study"). This new, 117-page study provides substantial additional evidence supporting each of the two core conclusions in the Manufacturer Comments:

- Conclusion 1: Eliminating FCC rules requiring ILECs to provide CLECs with UNE-P and enterprise loops and transport at UNE prices will result in a huge increase in capital spending by both ILECs and CLECs (See Manufacturer Comments at 4-9). The U.S. Chamber study provides additional evidence supporting this conclusion by projecting that repealing rules requiring ILECs to provide network functions at UNE prices could (i) increase ILEC capital spending by an average of \$3.1 billion during each of the next five years (U.S. Chamber Study at 92-93), (ii) increase CLEC capital spending by an average of \$540 million during each of the next five years (Id. at 94), and (iii) increase cable TV operator investment in telephony infrastructure by an average of \$527 million during each of the next five years (Id. at 97-98).
- Conclusion 2: Eliminating FCC rules requiring ILECs to provide CLECs with UNE-P and enterprise loops and transport at UNE prices will improve the U.S. economy as a whole. (See Manufacturer Comments at 10-15). The U.S. Chamber study provides additional evidence supporting this conclusion by projecting that repealing rules requiring ILECs to provide network functions at UNE prices could, over the next five years, increase U.S Gross Domestic Product by more than \$59 billion and add more than 75,000 new jobs. (U.S. Chamber Study at 103-07).

The U.S. Chamber study can be accessed on the Internet at the following address:

http://www.uschamber.com/broadband/041006teledommstudy.htm.

Rodney L. Joyce

Respectfully submitted

for Ad Hoc Telecom. Mfg. Coalition